

EXHIBIT 1

Victoria Giese

From: Cory Liu
Sent: Friday, May 26, 2023 9:49 AM
To: Victoria Giese
Subject: Fwd: [External Email] Activity in Case 5:21-cv-00844-XR La Union Del Pueblo Entero, et al v. Gregory W. Abbott, et al Motion for Leave to Exceed Page Limitation

Begin forwarded message:

From: Cory Liu <Cory.Liu@butlersnow.com>
Date: May 23, 2023 at 3:54:37 PM CDT
To: Zachary Dolling <zachary@texascivilrightsproject.org>, SB1-OCA-Ps@texascivilrightsproject.org
Subject: RE: FW: [External Email] Activity in Case 5:21-cv-00844-XR La Union Del Pueblo Entero, et al v. Gregory W. Abbott, et al Motion for Leave to Exceed Page Limitation

What claims if any do you believe should be pursued against the Harris County District Attorney in the first phase?

Cory R. Liu
Butler Snow LLP

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1400 Lavaca Street, Suite 1000, Austin, TX 78701
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From: Zachary Dolling <zachary@texascivilrightsproject.org>
Sent: Tuesday, May 23, 2023 3:27 PM
To: Cory Liu <Cory.Liu@butlersnow.com>; SB1-OCA-Ps@texascivilrightsproject.org
Subject: Re: FW: [External Email] Activity in Case 5:21-cv-00844-XR La Union Del Pueblo Entero, et al v. Gregory W. Abbott, et al Motion for Leave to Exceed Page Limitation

Hi Cory,

You are correct that the OCA Plaintiffs do not intend to seek summary judgment on their claims against the Harris County District Attorney on May 26. However, we do not view that as precluding us from pursuing those claims at trial during the first phase of the currently bifurcated proceedings.

Thanks,

Zach Dolling
Texas Civil Rights Project
Mobile: 512-496-4746

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On Tue, May 23, 2023 at 3:18 PM Cory Liu <Cory.Liu@butlersnow.com> wrote:

Zachary,

Based on this filing, can you confirm for me that it is OCA Plaintiffs' understanding that they are not pursuing any claims against the Harris County District Attorney in the first phase of the bifurcated proceeding?

I ask because we need to know what, if any, claims involving my client are subject to the May 26 summary judgment deadline.

Thank you,

Cory R. Liu

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From: TXW_USDC_Note@txwd.uscourts.gov <TXW_USDC_Note@txwd.uscourts.gov>

Sent: Tuesday, May 23, 2023 12:47 PM

To: cmech_notices@txwd.uscourts.gov

Subject: [External Email] Activity in Case 5:21-cv-00844-XR La Union Del Pueblo Entero, et al v. Gregory W. Abbott, et al Motion for Leave to Exceed Page Limitation

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U.S. District Court [LIVE]

Western District of Texas

Notice of Electronic Filing

The following transaction was entered by Dolling, Zachary on 5/23/2023 at 12:47 PM CDT and filed on 5/23/2023

Case Name: La Union Del Pueblo Entero, et al v. Gregory W. Abbott, et al

Case Number: [5:21-cv-00844-XR](#)

Filer: League of Women Voters of Texas
OCA-Greater Houston
REVUP-Texas

Document Number: [604](#)

Docket Text:

Opposed MOTION for Leave to Exceed Page Limitation *Partially Opposed Motion to Extend Page Limit for Motion For Summary Judgment to Include Full Statement of Uncontested Facts* by League of Women Voters of Texas, OCA-Greater Houston, REVUP-Texas. (Dolling, Zachary)

5:21-cv-00844-XR Notice has been electronically mailed to:

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5:21-cv-00844-XR Notice has been delivered by other means to:

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American Civil Liberties Union Foundation, Inc.
125 Broad Street, 18th Floor
New York, NY 10004

Robyn Sanders
Brennan Center for Justice
120 Broadway, Suite 1750
New York, NY 10271

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[STAMP_dcecfStamp_ID=1080075687 [Date=5/23/2023] [FileNumber=28584468-0] [9b130521b75ef5e3cd7cbe3bfd7c29270bcf5b5ef49f7a1e1376de8dd909bf4a5469b3dbdd06e8234a3a69edba77315420f8e40d3f2140a6c9c8c37ab51ce2d1]]

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Victoria Giese

From: Jennifer A. Holmes <jholmes@naacpldf.org>
Sent: Thursday, May 25, 2023 9:05 AM
To: Cory Liu
Cc: Eric Nichols; Victoria Giese; Shira Wakschlag
Subject: [External Email] RE: Meet and Confer in Texas S.B. 1 Litigation

Hi Cory,

We are still finalizing our position, but we believe at least the undue burden claim (count 1), the Sec 2 claim related to discriminatory results (count 4), the Sec 208 claim (count 5), ADA claim (count 7), and Section 504 claim (count 8) against DA Ogg should be tried in September.

Best,
Jennifer

Jennifer A. Holmes (she/her)

Senior Counsel



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From: Cory Liu <Cory.Liu@butlersnow.com>
Sent: Tuesday, May 23, 2023 7:04 PM
To: Jennifer A. Holmes <jholmes@naacpldf.org>
Cc: Eric Nichols <Eric.Nichols@butlersnow.com>; Victoria Giese <Victoria.Giese@butlersnow.com>
Subject: Meet and Confer in Texas S.B. 1 Litigation

[Caution: EXTERNAL EMAIL]

Jennifer,

Can you please let us know HAUL plaintiffs' view on which of your claims, if any at all, against the Harris County District Attorney, should be tried in the first phase of the anticipated bifurcated proceeding?

Cory R. Liu
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Victoria Giese

From: Cory Liu
Sent: Tuesday, May 23, 2023 7:47 PM
To: 'unkwonta@elias.law'; cdodge@elias.law
Cc: Eric Nichols; Victoria Giese
Subject: RE: Meet and Confer in Texas S.B. 1 Litigation

Apologies, I mistyped one of your email addresses. Hopefully I got it right this time.

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From: Cory Liu
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Cc: Eric Nichols <Eric.Nichols@butlersnow.com>; Victoria Giese <Victoria.Giese@butlersnow.com>
Subject: Meet and Confer in Texas S.B. 1 Litigation

Counsel,

Can you please let us know LULAC Plaintiffs' view on which of your claims, if any at all, against the Harris County District Attorney should be tried in the first phase of the anticipated bifurcated proceeding?

Thank you,

Cory R. Liu
Butler Snow LLP

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Victoria Giese

From: Cory Liu
Sent: Wednesday, May 24, 2023 10:58 AM
To: 'Olson, Wendy J.'; Rosenbaum, Laura E.; Watkins, Elijah M.; Bieter, Mark L.; Prowant, Bradley R.
Cc: Eric Nichols; Victoria Giese
Subject: Meet and Confer in Texas S.B. 1 Litigation

Counsel:

Can you please let me know Mi Familia Vota Plaintiffs' view of which of your claims, if any at all, against the Harris County District Attorney, should be tried in the first phase of the anticipated bifurcated proceeding?

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